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**References**

Blanchett, W. J. (2010). Telling It Like It Is: The Role of Race, Class, & Culture in the Perpetuation of Learning Disability as a Privileged Category for the White Middle Class. *Disability Studies Quarterly*, 30(2), 6.

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### **"Telling It Like It Is: The Role of Race, Class, & Culture in the Perpetuation of Learning Disability as a Privileged Category for the White Middle Class"**

#### **Telling It Like It Is: The Role of Race, Class, & Culture in the Perpetuation of Learning Disability as a Privileged Category for the White Middle Class"**

For more than 40 years, the American educational system has used mild disability special education categories to sort students on the basis of perceived disability, race, culture, language, and social class. Accordingly, African American and other students of color have the highest risk ratio for being placed in special education and they received the most segregated special education placements (Blanchett, Mumford, & Beachman, 2005; Dunn, 1968; Losen & Orfield, 2002; Mercer, 1973). How the social constructions of mild disabilities and learning disabilities, in particular, perpetuate learning disability as a privileged category for the White Middle Class while marginalizing students of color has been largely missing in the disability studies and disproportionality debates. The purpose of my paper is to commemorate and revisit Sleeter's seminal work while contextualizing it within contemporary debates by address the following four questions: (1) What is the historical context of the treatment of African American and other students of color in special education?; (2) Is learning disabilities a category of privilege for the privileged?; (3) What is the social cultural context of learning disabilities in the 21st century?; and (4) In what ways do students who receive the same label of LD have very different in-school and post-school experiences based upon the intersection of race and class with LD?

Few researchers and scholars in education as a whole and even fewer in special education have sought to explore and grapple with issues pertaining to the social context that has both given birth to and continues to maintain the social constructions of mild disabilities in the American culture. To be clear, some scholars (e.g., Dunn, 1968; Mercer, 1973) have long questioned the social constructions of mild disabilities and the practice of sorting children on the basis of the intersections of race, culture, socio-economic status, and perceived ability. However, with the exception of scholars such as Dr. Asa G. Hilliard, III, few of these early pioneer scholars linked these sorting practices to larger social and societal phenomenon that were at work and that were intentionally designed to prevent the integration of black and white children. Legal mandates paved the way for children to be physically present in the same schools, but special education identification practices became the way to ensure that they were not in the same classrooms. While some of the early pioneers who called attention to this method of segregating (i.e., separate special education classrooms) African American and Hispanic children in supposedly integrated American schools were white themselves, naming the social phenomenon that was likely at play (i.e., racism, white supremacy, white dominance, white privilege) was

usually the responsibility of African American and other scholars of color.

This, however, changed in 1987 when a young, white, former special education teacher from Oregon employed her acquired formal education in multicultural education, her insider experiences as a white person living in America, and her personal commitment to social justice to examine the socio-cultural context that gave birth to the disability category of learning disabilities. She named the socio-cultural context surrounding the creation and maintenance of the disability category of learning disabilities in very bold terms.

As the Guest Editors of this special issue Drs. Connor and Ferri have asserted,

It has been just over 20 years since the publication of Christine Sleeter's, "Why is There Learning Disabilities? A Critical Analysis of the Birth of the Field of Special Education in its Social Context." In this seminal publication, Sleeter argues that the category of LD emerged to fulfill a particular political and economic purpose during the Cold War threats to U. S. supremacy. (2010)

Sleeter provided an explanation for why learning disabilities emerged as a disability category that shocked many, but that few have been able to successfully refute. In her own words in the introduction of the chapter, Sleeter (1987) states that:

This chapter offers a different interpretation for why learning disabilities exist. It argues that the category emerged for a political purpose: to differentiate and protect White middle class children who were failing in school from lower class and minority children, during a time when schools were being called upon to raise standards for economic and military purposes. Rather than being a product of progress, the category was essentially conservative in that it helped schools continue to serve best those whom schools have always served best: the White middle and upper-middle class. (p. 212)

Given that this special issue provides an opportunity for us to both commemorate and revisit Sleeter's seminal work while also contextualizing it within contemporary debates, the purpose of my paper is to address the following four questions: (1) What is the historical context of the treatment of African American and other students of color in special education? (2) Is learning disabilities a category of privilege for the privileged? (3) What is the social cultural context of learning disabilities in the 21st century? and (4) In what ways do students who receive the same label of LD have very different in-school and post school experiences based upon the intersection of race and class with LD? To begin to address these questions I will first attempt to situate the treatment of these students within the context of the larger American educational system and its treatment of children on the basis of the intersection of race, culture, language, and class.

### **Historical Context of the Treatment of African American and Other Students of Color in Special Education**

Prior to the development of learning disabilities as a disability category and shortly after the courts ordered schools to desegregate and began enforcing desegregation plans in the years following the Brown decision, it became apparent that significant percentages of African American children and Mexican-American students in New York and California, respectively, were being labeled as mildly mentally retarded and placed in segregated classrooms (Dunn, 1968; Mercer 1973). In working with poor inner-city students in New York, Dunn noted that African American students' representation in programs for students identified as having mild mental retardation exceeded rates that would be expected given their relative size in the general population of school-aged children. Specifically, Dunn called attention to the fact that African American children were labeled as mildly mentally retarded and their white peers were not labeled at all, even when the white children evidenced more significant levels of mental retardation than the African American students. Mercer (1973) noted similar patterns in California among Mexican-American students who were new immigrants and English language learners or non-speakers. The work of these researchers and others was the basis for *Larry P. v. Riles* which helped to end the use of intelligence tests as the sole basis for determining special education eligibility and played a role

in securing some of the safeguards guaranteed by IDEA today (Blanchett, 2009). Additionally, this research provided the legal basis for parents and advocates to challenge special education referral, evaluation, and placement decision-making and led to the establishment of several national committees to study the disproportionate representation of African American and other students of color in special education. Over the last couple of decades, we have seen the Harvard Civil Rights Project play an ongoing role in studying this issue, two National Academy of Science (NAS) studies commissioned, and the development of a lengthy list of recommendations for addressing this issue introduced by Dunn and Mercer. However, despite all of these noteworthy efforts, overrepresentation and disproportionate representation of African American and other students of color has persisted for more than 40 years. As stated above, the initial concerns related to disproportionality were centered on African American and Mexican American's placement in mild mental retardation classrooms at disproportionate rates. However, as other socially constructed disabilities categories (e.g., Learning Disabilities, Emotional and Behavioral Disabilities) have been developed and incorporated into legislation, similar trends of disproportionality have been associated with them as well. More importantly, it seems that while learning disabilities may have been developed, as Sleeter states, as a disability category to protect while middle class children from school failure, the American educational system and our society has not missed any opportunity to use it to continue a sorting system for children on the basis of race, ethnicity, culture, and social class and to re-segregate students of color. African American students have the highest risk ratio for LD (the risk of identification in comparison to white students) with a risk ratio that ranges from 1.1 to 2.85 and Hispanic students have a risk ratio of .57 to 1.97 (NCCRESt, 2009). Though a larger number of students with learning disabilities are placed in general education classrooms than those with other disabilities, African American students labeled with disabilities (a high percentage who are labeled with LD), even today, have some of the most segregated placements (27th Annual Report to Congress, 2005). For example, with regard to general education, or least restrictive environment placements (LRE) less than 40% of the day, African American students have a risk ratio range of .97 to 3.62 (NCCRESt, 2009). It is important to note that the category of learning disabilities has changed drastically with regard to race/ethnicity and social class since Sleeter wrote her paper about white students receiving the LD label while children of color received the MR label. Today, African American children and other children of color are identified with LD labels more frequently than white students, and, once identified, have a risk ratio of up to 3.62 times white children of being placed in segregated classroom settings (NCCRESt).

### **Learning Disabilities: A Category of Privilege for the Privileged**

For many years the disability category of learning disabilities was primarily comprised of males (Valdes et al., 1990) with an overwhelming percentage of white males. In fact, "boys outnumber girls by about three to one in the learning disabilities category" (Hallahan & Kauffman, 2006, p. 175). While there are varying levels of privilege that exist in American society, white male privilege and white middle class privilege are very prominent in many American institutions, including education (Kivel, 2004). Thus, Sleeter's argument that learning disabilities was developed to protect white middle class children from school failure and to ensure that they were deemed more intellectually superior to their black and brown peers remains a valid argument. I do not know if it is strictly coincidental, or if it was a part of the original intent, but from its inception as a disability category, an overwhelming majority of the students (i.e., the white middle and upper class students) labeled with LD (a disproportionate percentage of whom are males) have been treated in privileged ways when compared to other socially constructed mild disability categories (e.g., emotional and behavioral disorders). Some scholars have argued that males being overrepresented in these categories might be the result of the fact that females are underrepresented, and/or that an overwhelming female teaching force may be more inclined to refer males for special education services base upon a wide range of factors such as behavior and maturation (Harmon, Stockton, & Contrucci, 1992). While there may be some validity to these arguments, they do not explain why middle- and upper class white students with LD receive accommodations and modifications within the general education classroom setting while students of color with the same labels are educated in self-contained settings.

Although the Individuals with Disabilities Education Act (IDEA) requires that states report on the implementation of IDEA in terms of the race and ethnicity of students served under each disability category, surprisingly, these data do not provide a breakdown of the gender, socioeconomic status, and placement for each disability category. However, NCCRESt's 2007 data by state illustrates that white children with LD represent from 1.6-5.2% of the school age population of White children, compared to African American children with LD representing from 1.8-14.9% of the total population of African American children. More importantly, it appears that white students with LD may be privileged in terms of their access to the general education classroom, rates of high school graduation, postschool outcomes, and overall societal acceptance. With regard to placement, during the 1989-90 school year as reported by the Advocacy Institute (2002), 21% of students with LD spent less than 20% of their in-school time outside of the regular classroom. However, data for 1998-99 illustrated that 45% of students with LD spent less than 20% of their time outside of regular classrooms, meaning that twice as many students with LD were educated in regular classrooms between 1989-90 and 1998-99.

Students labeled as having a learning disability are by the codified federal definition of a learning disability deemed intellectually superior or privileged compared to their peers because they are reported to have average or above intelligence, which sets them aside from students identified with developmental disabilities, who are reported to have significantly lower levels of intellectual ability (National Dissemination Center for Children with Disabilities (NICHCY), 2009). For example, according to NICHCY, "...Researchers think that learning disabilities are caused by differences in how a person's brain works and how it processes information. Children with learning disabilities are not 'dumb' or 'lazy.' In fact, they usually have average or above average intelligence. Their brains just process information differently" (p. 1). Although the way in which LD is identified today is evolving as a result of the Reauthorization of the Individuals with Disabilities Education Act of 2004, as illustrated above by the language used to define LD and to differentiate LD from developmental disabilities, white students with LD are more normalized. And as a result, they appear to be more privileged in our society than are students of color with LD and students who are identified with developmental disabilities due to the social construction of the LD category and the overwhelming continued reliance on the medical model even today in the diagnoses of developmental disabilities including mental retardation and autism. The privileging of LD is reflected in special education introductory textbooks (e.g., Smith, 2004) that often give a vignette of someone with incredible creativity or ability that experts in the field of learning disability now believe might have had a learning disability even though the term LD had not been socially constructed during many of these individuals' lifetimes. In addition to illustrations of individuals with learning disabilities in textbooks that depict them as being very creative and intelligent, but who struggle in school, even recent publicity campaigns for dyslexia (i.e., a learning disability characterized by reading difficulties) highlight individuals like Picasso, Leonard Da Vinci, Tom Cruise, Thomas Edison, Richard Branson, Jay Leno, and Whoopi Goldberg as famous people with dyslexia (Dyslexia Online, 2009). While this is undoubtedly a creative and talented group of individuals, it is interesting to note that they are primarily white men and may not be representative of students who are labeled LD today.

It seems that regardless of where illustrations of learning disabilities occur (e.g., textbook, website), they are designed to help the reader begin to understand how special or intelligent individuals with learning disabilities are. Such illustrations start to "normalize" students with LD among educators and our society as a whole, portraying them as a unique and talented heterogeneous group of learners who struggle in school. As Erevelles (2005) has argued, this is likely the case because as a society we seem to be far more accepting of individuals with a disability that do not look very different from us, and we also make assumptions about cognitive ability based upon what we perceive to be "normal." In fact, we have been conditioned in American society to primarily see students with learning disabilities as being just like us with a couple of extra challenges in learning. However, much to the detriment of individuals with developmental disabilities, as a normalized society, we too often see them as being drastically different from us when they too are just like us with a few extra challenges. To be sure, I am arguing that everyone with a disability should be seen as "just like us," or better yet, there should be no "us and them." And as such, all individuals with disabilities should be valued and

respected without the perception of the need to "fix them" -- not just those with LD.

In addition to being a privileged disability category in terms of the perception of their intellectual superiority and creativity, as stated previously, individuals identified with learning disabilities are often privileged in terms of the services that they receive once identified and in their access to the general education classroom and to all other aspects of life when compared to individuals with developmental or intellectual disabilities (i.e., mental retardation, autism). When the privilege conferred by the LD label is compounded by the privilege of whiteness and social class privilege, it greatly advantages those students. However, when LD intersects with lower socio-economic status or class and with being African American or of color, the privileges described above that are often associated with LD are denied these students.

### **The Social Cultural Context of Learning Disabilities in the 21st Century**

As of Fall 2004, learning disabilities was the largest disability category and accounted for 46.4 percent of all students ages 6 through 21 receiving special education and related services under IDEA (28th Annual Report to Congress on the Implementation of Individuals with Disabilities Education Act, 2009). While there has been little overall change in the percentage of students served in most IDEA protected disability categories over the last ten years, from 1993-2003 students receiving services in LD increased from 4.1 percent in 1993 to 4.3 percent in 2003 (27th Annual Report to Congress, 2005). Although the category of learning disabilities might have been, as Sleeter argues, developed for white middle- and upper-class school-aged children, as students of color failed to qualify for special education under other disabilities categories (e.g., Mental Retardation), we have seen an increase in the number of them labeled LD. For example, nationally, 56.6% of all Hispanic students receiving special education services received them in LD, 53.3% of American Indian/Alaska Natives, 44.8% of black, 44.1% of white, and 38.4% of Asian/Pacific Islander (28th Annual Report to Congress on the Implementation of Individuals with Disabilities Education Act, 2009).

In addition to learning disabilities accounting for the largest percentage of students served ages 6-21 in the national data across all ethnic groups, American Indian/Alaska Native students had the highest risk ratio for LD at 1.79 followed by black students at 1.42, Hispanic 1.15, white .80, and Asian/Pacific Islander .40 (28th Annual Report to Congress on the Implementation of Individuals with Disabilities Education Act, 2009). These national data suggests that American Indian/Alaska Native and black students are 1.8 times and 1.4 times more likely, respectively, than their non-American Indian/Alaska and non-black peers to be identified as having a learning disability. However, as illustrated earlier, the national aggregates do not give a clear picture of what occurs at the state level and nor does it capture the variability across states in the identification and labeling of students with learning disabilities. Using the NCCRESt data for the 2006-07 academic year, African American students risk ratio ranges from 1.11 in Kentucky to 2.85 in Iowa, American Indian from .58 in Mississippi to 2.82 in Washington state, Hispanics from .57 in Louisiana to 1.97 in Minnesota, and Whites from .40 in Hawaii to 1.26 in Vermont.

These disaggregated state data highlight the importance of not just looking at the national aggregates. Also, when examining the state disaggregates it is important to taken into consideration that a lot of variance remains in how states identify students with learning disabilities. Further, the disaggregated state data shows disproportionality among racial/ethnicity groups that are concentrated in specific regions and states that does not show up in the national aggregate data. It is also important that any discussion of students' risk for LD take into consideration the role that the historical context of racism, white privilege, and classism in the American educational system and society as a whole has played and continues to play in these students' perceived or actual risk for disability identification. Once students of color are identified as having LD, they seem to have very different experiences from their white peers with the same label. These differences appear to be in access to the general education classroom, quality of services provided, postsecondary education, and in overall outcomes and quality of life.



### Same LD Label: Different Experiences on the Basis of Race and Social Class

In recent years, 50% of all students with disabilities have been educated in the general education or inclusive classroom alongside their peers without disabilities (27th Annual Report to Congress, 2005). Students labeled with speech or language impairments make up of the majority of students who are educated in general education classrooms followed by those with learning disabilities. For example, in 2003, 49.9% of all students with disabilities ages 6-21 who received special education services were educated outside of the general education classroom for less than 21% of their total school day and 48.8% of students with learning disabilities spent less than 21% of day outside of general education classroom (27th Annual Report to Congress, 2005). These percentages reflect a welcomed trend toward educating students with learning disabilities in general education classrooms. However, when it comes to educational placements, not all students with learning disabilities are afforded equitable access to general education or to inclusive classrooms where they will be educated with their peers without disabilities. In fact, recent data shows that "compared to students with disabilities from other racial/ethnic groups, black students with disabilities were the least likely to be educated in the regular classroom for most of the school day (38.6 percent). White students with disabilities were the mostly likely to be educated in the regular classroom for most of the school day (54.7)" (27th Annual Report to Congress, 2005, p. 48). The same report finds, "Black students with disabilities were more likely than students with disabilities from other racial/ethnic groups to be educated outside the regular classroom more than 60 percent of the day (28.1 percent). They were also more likely to be educated in separate environments (5.2 percent)" (27th Annual Report to Congress, 2005, p. 48). Whether students with disabilities are placed in general education or segregated special education classrooms has been associated with decreased graduation rates, increased dropout rates, diminished secondary education options, and a negative overall post-school experience.

During the 1998-99 academic year, students with LD had a 63.3% graduation rate, significantly higher than the graduation rate for all students with disabilities as whole at 57.4%. Though race and ethnicity data were not available for graduation rates, as stated above, according to the Advocacy Institute (2002), "...Given the large proportion of students with SLD in the overall population of students with disabilities, this data would suggest that the graduation rates for students with SLD vary significantly by racial/ethnic group" (p. 3). However, dropout data was available on the basis of race/ethnicity. For this same academic year, students with LD had a 27.1% dropout rate compared to a 28.9% dropout rate for all students with disabilities, 44% for American Indian/Alaska Native, 33.7% for black, 32.3% for Hispanic, 26.9% for white, and 18.8% Asian/Pacific Islander (Advocacy Institute, 2002). These data suggest some differences in types of placement, graduate rates, and dropout rates on the basis of race and ethnicity with White students with learning disabilities and other disabilities appearing to fare much better than American Indian, black, and Hispanic students. As stated previously, available data does not provide an ethnic/racial breakdown for each disability category in terms of type of placement, gender, social class, dropout rate, percentage of students who receive a regular high school diploma versus a non-regular diploma, and percentage of students that enter postsecondary education. However, given the data that is available it is highly likely that these data would, as the Advocacy Institute (2002) indicated, "...Vary significantly by racial/ethnic group" (p.3).

The intersection of race and social class seems to impact students' risk ratio, identification, type and quality of placement, and graduation and dropout rates. Additionally, the intersection of race and social class impacts the postsecondary outcomes of all students labeled with disabilities and specifically those labeled with learning disabilities' postsecondary education outcomes. For example, according to the National Longitudinal Transition Study (2009),

...The differences for youth related to household income were significant. Youth from households earning more than \$50,000 were more likely than youth from households earning \$25,000 or less to have held a job over the time since leaving high school (81 percent vs. 61 percent)...At the time of the interview, 63 percent of White youth were employed, compared with 35% of African American youth. The percentages of these youth who

have been employed since leaving high school also differed significantly, with 80 percent of White youth having been employed since high school compared with 47 percent of African American youth. (Newman, Wagner, Cameto, & Knoke, p. 50)

As the statistics above clearly indicate, race and class race and class continues to play a significant role in who is identified and placed in the special education category of learning disability, their risk ratio for being identified, their access to the general education classroom, and ultimately their overall in-school and post school experiences. To be sure, once students of color enter the American educational system, regardless of whether they are placed in general or special education or labeled with a learning disability or mental retardation, they have quantitatively and qualitatively different experiences from their white peers, and this is exacerbated in urban settings. To make matters worse, our current educational climate is in many ways much like the one Sleeter describes in the 1950s and 1960s. Like the supposed focus on improving educational standards after Sputnik, today, through the No Child Left Behind Act of 2000, we have witnessed the massive watering down of already sub-standard curriculum and the removal of sound pedagogy from our classrooms, especially in those urban schools serving some of our historically most under-served students (Fusarelli, 2004; Kozol, 2009). All of this is happening at a time when we (Americans) are focused on globalization and preparing American students to compete in a globally diverse and interconnected world. Yet, we are continuing to fail to tap the potential of thousands of urban children (a disproportionate percentage whom are African American and other students of color) as they sit in segregated classrooms waiting for someone to throw them lifelines. Instead, as a society, we seem to be about business as usual -- American supremacy.

As I have stated previously (Blanchett, 2009), contrary to what some believe, the struggle to desegregate schools and special education programs in particular and to ensure that all children receive an equitable education is much larger than simply wanting students of color and white students to sit next to each other and to be educated in the same environment. While it makes sense that we would expect public schools to be reflective of the diversity that exists in our society and for children to be educated in racially, culturally, and linguistically diverse settings, integrated and equitable schools offer the potential for other opportunities as well. For many poor parents of color and some middle-class parents, especially those in urban settings, integrated, equitable schools are their only hope for their children receiving high-quality educational opportunities. In fact, research has illustrated that schools attended primarily by African American and/or Latino students are often schools that are deemed high-poverty schools, have high turnover of the teaching and instructional staff, high number of uncertified or provisionally licensed teachers, limited access to technology, few educational specialists (e.g., math and reading specialists) and resources (e.g., accelerated curriculum for all students), limited extracurricular opportunities, and dilapidated physical environments (Ayers & Ford, 1996; Blanchett, 2009; Blanchett, Mumford, & Beachum, 2005; Kozol, 1992). Moreover, in recent years and with the implementation of the No Child Left Behind Act of 2000 (NCLB), the school described above is more likely to be identified as a "failing school" or a school "in need of improvement," despite the obvious lack of financial, human, and educational resources provided other schools.

On the other hand, schools that have a majority white student body are often viewed as just the opposite of those attended by a majority of African American and/or Latino students. They are often located in suburban or rural areas and are touted and labeled as "high performance" schools. Many of their teachers and instructional staff hold graduate degrees, receive higher salaries, have access to state of the art technology and science labs, accelerated, honors, and/or Advanced Placement curriculum, newer or renovated physical structures, and a waiting list of teachers who would like to become employed with the school. Despite numerous calls for local, state, and federal policy makers to be responsive to the fiscal needs of students in large metropolitan areas (a large percentage of whom live in poverty and are students of color), the funding in many of these schools continues to be insufficient. Middle-class parents, a disproportionate percentage of whom are white, have actively opposed tax increases and other proposals to augment funding of urban schools. These actions are the result of an effort to ensure the success of majority white schools often attended by their children, and

ultimately, to maintain educational privilege (Brantlinger, 2003). Many researchers have cited the overt underfunding of urban schools and the lack of societal ownership and responsibility for the success of these students as the newest form of structural racism and discrimination (Kozol, 1992; Losen & Orfield, 2002). More importantly, the failure to provide students in urban settings, a disproportionate number of whom are poor and students of color, with a high-quality equitable education has been identified as a major contributing factor to the overrepresentation of students of color in special education. Majority white schools' use of special education placement to re-segregate students of color in racially homogeneous separate special education classrooms also contributes to disproportionality (Losen & Orfield, 2002). While the initial overrepresentation of African American and Mexican students was associated with mild mental retardation, shortly after the conception of the learning disability as a category of privilege for the privileged, it too quickly became a dumping ground for children of color who did not "qualify" for mild mental retardation or other developmental disabilities. As time has illustrated, not all students with the label of learning disability would receive the same high quality services and access to the general education classroom and subsequently to postsecondary opportunities. In fact, the privileges associated with the category of learning disabilities would only be afforded to some and not to all who shared the LD label.

## Conclusion

Sleeter asserts that the disability category of learning disability was conceived and formed to respond to political, military, and economic pressures to supposedly increase educational standards for all American children in an effort to ensure America's dominance and supremacy in the world while also protecting White middle- and upper-class children from school failure. If you are like me and you see the merit in Sleeter's argument, you have to face the fact that even at that time (during the 1950s and 60s) when America was focused on raising the standards for all children, not all children were REALLY included. Does this sound familiar? As I have already stated (e.g. Blanchett, 2006), the American educational system has a long and sordid history of not educating ALL of its children -- the reasons offered for this intentional neglect differs from scholar to scholar -- however, racism, white privilege, and white dominance and supremacy are rarely mentioned as the primary culprits. The American educational system and society as a whole has purported to launch initiatives that are in the best interest of the "public good" to secure the American public's support for these initiatives, while in reality the initiatives that are implemented often do just the opposite. While I am not a believer in conspiracy theory per se, I agree with Sleeter that developing and instituting a way to explain White middle and upper class students' failure during a period of increasingly higher educational standards was a deliberate move to ensure and protect white middle class intellectual supremacy. More importantly, as illustrated above, this system of privilege pertaining to LD that Sleeter uncovered is still securely in place today and has been coupled with new initiatives and legislation that is devastating many urban communities and the potential of children of color.

Writing a paper that named the social-cultural context surrounding the creation and maintenance of learning disabilities would have been gutsy at any point in her career, but to do so as a little-known untenured assistant professor was courageous and risky to say the least. To have done so more than 20 years ago is almost unheard of, let alone to have done so in a manner where what was written then is still so groundbreaking and seminal that researchers and scholars are still trying to make meaning of it and to operationalize it into educational research, policies, and practices that support the major tenets of the argument. The person who did provided a framework, which I and others can employ to examine the special education category of learning disabilities, is indeed a woman of great conviction and a scholarly friend. More importantly, she is a human being who saw practices that were not adequately described and explained in the professional literature at the time, and she could not ignore it. Today, even in retirement, Dr. Christine Sleeter is still pushing the academy and our society to think more deeply about issues of social justice and the importance of social context in educational research, policy, and practice. If we embrace Sleeter's (1987) article and see the validity of her arguments, we would move swiftly to create a social context and employ a social justice lens to uncover and eradicate differential and inequitable treatment of ALL children -- those labeled as having learning and other



disabilities, those who languish in urban areas, and those from diverse racial, ethnic, class, and linguistic backgrounds. More importantly, we would have the conviction of Sleeter to conduct research and to make scholarly contributions that "attempt to correct so many generations of bad faith and cruelty, when it is operating not only in the classrooms but in society" (James Baldwin, 1963 as cited in Ayers, Ladson-Billings, Michie, & Noguera, 2008, p. XIII).

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